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Attorneys for Defendant and Cross-Complainant
CITY OF WILLITS

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SONOMA

BROOKTRAILS TOWNSHIP COMMUNITY
SERVICES DISTRICT, a Public Agency,

Plaintiff,

v.

CITY OF WILLITS, a General Law City; and
DOES 1 through 100, inclusive,

Defendants.

CASE NO.: SCV 253175

(Unlimited Jurisdiction)

**NOTICE OF TAKING DEPOSITION AND
REQUEST TO PRODUCE DOCUMENTS
AND THINGS**

[C.C.P. §2025.010 *et seq.*]

Dept. 16

*Assigned for all purposes to
Honorable Elliot Daum*

AND RELATED CROSS-ACTION.

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that pursuant to Code of Civil Procedure § 2025.010 *et seq.*,
attorneys for defendant will take the deposition of **Donald McEdwards**, before an officer who is
authorized to administer oaths, at the Law Offices of Geary, Shea, O'Donnell, Grattan & Mitchell,
37 Old Courthouse Square, 4th Floor, Santa Rosa, California, at the time and date specified, and
said deposition will continue from day to day until completed.

DATE: April 21, 2014

TIME: 10:00 a.m.

LAW OFFICES OF
GEARY,
SHEA,
O'DONNELL,
GRATTAN &
MITCHELL
P.C.

1 NOTICE IS HEREBY FURTHER GIVEN that pursuant to Code of Civil Procedure § 2020
2 demand is hereby made upon said deponent to produce at said deposition all writings as defined in
3 Evidence Code §250 and all other items described in Exhibit A attached hereto and incorporated
4 herein by reference.

5 DATED: March 28, 2014

GEARY, SHEA, O'DONNELL, GRATTAN
& MITCHELL, P.C.

6
7
8 By



STEVEN C. MITCHELL
Attorneys for Defendant/Cross-Complainant
CITY OF WILLITS

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26 LAW OFFICES OF
GEARY,
SHEA,
O'DONNELL,
27 GRATTAN &
MITCHELL
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1 **EXHIBIT A**

2 Your complete file regarding plaintiff Brooktrails Township Community Services District,
3 including but not limited to, any and all records, reports, memoranda, notes, photographs, drawings,
4 sketches, correspondence and other documents and things with regard to any and all consultations,
5 studies, examinations, inspections and/or tests performed with regard to the subject case.

6 Please include all examinations, inspections and tests and the names of each test as
7 documented in writing, together with the results thereof including opinions concerning the result of
8 the tests, inspections and examinations, together with the name, address and job titles of persons
9 performing the examinations, inspections and/or tests with regard to the subject case.

10 Also include all bills, receipts, invoices and other records for expenses with regard to the
11 subject case.

12 Also include, at the requesting party's expense, duplicates of any and all photographs, video
13 tapes and/or movies taken during any examination, study or inspection with regard to the subject
14 case.

15 Please also include your curriculum vitae.
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26 LAW OFFICES OF
27 GEARY,
28 SHEA,
O'DONNELL,
GRATTAN &
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PROOF OF SERVICE

I am employed in the County of Sonoma, State of California. I am over the age of 18 years and not a party to the within action. My business address is Geary, Shea, O'Donnell, Grattan & Mitchell, 37 Old Courthouse Square, Fourth Floor, Santa Rosa, CA 95404.

On March 28, 2014, I served the attached:

**NOTICE OF TAKING DEPOSITION AND REQUEST
TO PRODUCE DOCUMENTS AND THINGS**

on the parties to this action by placing a true copy thereof in a sealed envelope, addressed as follows:

*****SEE ATTACHED SERVICE LIST*****

/ X / (BY MAIL) I placed a copy of the above-described document in sealed envelope, with postage thereon fully prepared for First-Class Mail, addressed to the parties as set forth above, for collection and mailing at Santa Rosa, California, following ordinary business practices. I am readily familiar with the practice of Geary, Shea, O'Donnell, Grattan & Mitchell for processing of correspondence, said practice being that in the ordinary course of business, correspondence is deposited in the United States Postal Service the same day as it is placed for processing.

/ _ / (BY ELECTRONIC TRANSMISSION) I caused an electronic copy of the above-described document to be transmitted by e-mail to the address(es) known by or represented to me to be the receiving e-mail(s) of the parties noted above.

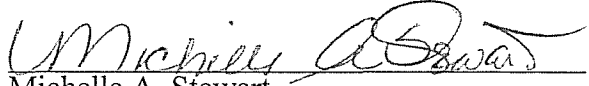
/ _ / (BY OVERNIGHT DELIVERY) I placed such sealed envelope for collection and mailing by overnight delivery at Santa Rosa, California, within the ordinary business practices of Geary, Shea, O'Donnell, Grattan & Mitchell. I am readily familiar with the practices of Geary, Shea, O'Donnell, Grattan & Mitchell for processing overnight correspondence, said practice being that in the ordinary course of business, correspondence is either picked up by or delivered to the delivery company the same day as it is placed for processing.

/ _ / (BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the parties at the address(es) noted above.

/ X / (State) I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

/ _ / (Federal) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed at Santa Rosa, California, on March 28, 2014.


Michelle A. Stewart

LAW OFFICES OF
GEARY,
SHEA,
O'DONNELL,
GRATTAN &
MITCHELL
P.C.

SERVICE LIST

Brooktrails Township Community Services District v. City of Willits
Sonoma County Superior Court Case Number SCV 253175

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